

# **Lightbulb Analytics Privacy Policy**

Your privacy is important to us. Lightbulb Analytics is committed to protecting your privacy and maintaining the integrity of any identifiable information ("Personal Information") we collect about you. The purpose of this Privacy Policy is to outline the steps we take to keep your Personal Information confidential, to inform you about how and why we collect Personal Information and to provide you with our contact information in case you have any questions or concerns arising out of our Privacy Policy.

Protecting your privacy and maintaining the integrity of Personal Information means that: we will keep your information and the business you do with us in confidence; we will not sell, rent or loan your information to third parties; we will respect your privacy when we may contact you concerning various products and services which we make available to you from time to time; you will have control over how we obtain, use and under circumstances give out information about you; and you will have access to the information that we have about you.

### Why Lightbulb Analytics May Collect Personal Information

Lightbulb Analytics collects Personal Information and uses it to:

- Establish identity;
- Perform necessary identity and security verifications;
- Process transactions and conduct business;
- Deliver products and services;
- Provide customer support and services;
- Provide ongoing service delivery;
- Provide you with information;
- Improve products, services and service delivery;
- Better understand your needs, interests and suitability for various products and services;
- Recommend specific products and services that may meet your needs;
- Respond to issues, questions, and queries;
- Protect you and us against errors or fraud; and
- Co-operate with law enforcement and legal authorities, where required, to comply with applicable laws and with court orders.

Lightbulb Analytics will collect, use and may disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances; and endeavours to collect as little information as possible as may be necessary under the circumstances. Please note that aggregated statistics and information, where the identity of a specific individual cannot be identified, is not Personal Information. Lightbulb Analytics reserves the right to use aggregated information in any manner it determines, at its discretion, to be appropriate. Use of such aggregated information may include, but not be limited to, the preparation of aggregated user statistics and information summaries to improve efficiencies, more effectively describe our product and service offerings, and assist in marketing our products and services. Aggregated statistics and information will not contain Personal Information.

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### What Type of Personal Information Lightbulb Analytics May Collect

Lightbulb Analytics collects various types of Personal Information. During the course of doing business or interacting with Lightbulb Analytics, or receiving products and services from or through Lightbulb Analytics, you may depend on the nature of the circumstances be asked to provide Lightbulb Analytics with:

- Geographic (physical) addresses;
- Demographic information;
- E-mail addresses:
- Phone numbers or other contact information;
- Names (first, and last or whatever the family identifying name is);
- Shipping information;
- Billing information;
- Transaction history;
- Web site usage preferences;
- Feedback regarding our business, services, website and public relations;
- Source IP addresses:
- Times and dates of access to Web site servers;
- Language:
- Personal preferences;
- Product and service preferences;
- Browsers types and configurations; and
- Miscellaneous administrative and computer traffic information.

Certain forms of information, such as government-issued or private sector-issued licenses, permits, certificates, cards, in the nature of driver's licenses, social insurance/security numbers, passports, insurance cards, voucher numbers, and the like, although convenient for identification, is voluntary. It is up to you whether you want to provide this, or other suitable identification, subject to any legal requirements.

# **How Does Lightbulb Analytics Collect Personal Information**

Lightbulb Analytics will only collect Personal Information that you have voluntarily provided to us or have agreed to have provided to us. Lightbulb Analytics will not collect any Personal Information about you without advising you accordingly (either by way of this Privacy Policy or by way of providing you with some other form of notice at the time we are requesting or collecting Personal Information), why and how that Personal Information is being collected and how such Personal Information will be used or disclosed. Lightbulb Analytics may collect Personal Information through a variety of means:

- using our website;
- using our services;
- in the course of communications with us (face-to-face, by e-mail, by phone, mail or otherwise);
- in the course of feedback to us regarding our business, services, website and public relations;

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- when registering with us for services or, where relevant, accounts, or, where relevant, for the download of our software;
- customer, membership, recipient, or service lists that have been lawfully acquired from third parties;
- through the completion of manual or electronic forms;
- website cookies Cookies are identifiers that can be sent from a website via your browser to be
  placed on your computer's hard drive. You may elect not to accept cookies by changing the
  designated settings on your web browser; however, not utilising cookies may prevent you from
  using certain functions and features of a website. Information collected from the use of cookies
  is used to improve Lightbulb Analytics services;
- web beacons Web beacons are small, graphic images that allow a website operator to collect certain information and monitor user activity on its website. A web beacon is a very small pixel which is invisible to the user. Lightbulb Analytics uses web beacons to collect information that is not of a personal nature;
- click streaming Clickstreaming is a technology that allows a website operator to track the paths that surfers take as they access a website and look at the site's pages, and as they use links to other sites. Lightbulb Analytics collects such information from visitors to www.lba.ltd and
- website traffic information, which is monitored and analysed to determine which products, services or features may be of interest to visitors, so we may improve our website, products, services, features or other offerings. In addition, we may review and analyse your use of products and services, to help us serve you better, and to bring other products and services to your attention, that we feel, will be of benefit to you. We also collect and analyse information from other sources for the same purposes.

# **How Lightbulb Analytics May Disclose Personal Information**

Lightbulb Analytics does not sell any Personal Information it collects to third parties. Lightbulb Analytics may share Personal Information with its affiliates, subsidiaries, employees, contractors and agents in the course of providing you with our business services, support, or the fulfilment or delivery of our products or services.

Lightbulb Analytics may disclose Personal information if we are required to do so in a court of competent jurisdiction, other legal or regulatory authority, or, if there is a good faith belief, and reliance on said belief that disclosure is necessary to: comply with any legal process served on Lightbulb Analytics; maintain, uphold or protect Lightbulb Analytics ' rights or property; protect and ensure the personal safety of the public or other Lightbulb Analytics clients; or protect against criminal or quasi-criminal activities, or to detect, prevent, investigate allegations of, or address, misrepresentation or fraud.

Lightbulb Analytics reserves the right that in the event of a bankruptcy filing, mergers with third parties, acquisition by third parties, sale of assets (all or partial), or any other transfer of all or substantially all of Lightbulb Analytics relevant assets to a third party, that Lightbulb Analytics shall be entitled share (or sell as an ancillary aspect of the overarching business transaction) the Personal Information you have provided to us to the third party.

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### **Retention and Disposal**

We keep information only for so long as it is needed for the efficient and effective delivery or fulfilment of the software, products, or services you are using or contemplating using and for a reasonable time thereafter, or to meet any legal requirements. We will either destroy or remove information when it is no longer needed.

### **Security and Storage**

Lightbulb Analytics endeavours to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities to prevent any loss, misuse, unauthorised access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information. Lightbulb Analytics keeps the Personal Information we collect about you strictly confidential. Only authorised personnel have access to this Personal Information. Lightbulb Analytics personnel who have access to Personal Information receive training regarding privacy protection.

If any employee, contractor or agent of Lightbulb Analytics misuses Personal Information, this will be considered a serious offence for which disciplinary action may be taken, up to and including termination of employment or contract for service. If any individual or organisation misuses Personal Information - provided to provide services to or for Lightbulb Analytics, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Lightbulb Analytics and that individual or organisation and possible legal action against such individual or organisation.

Our computer security specialists build security by design by default into our computer systems. The aim is to protect your information at all times, when it is stored in data files or handled by our employees. Our systems are also designed to protect your information when it is transmitted, for example, between our data processing centres, our stores and corporate offices. Personal Information may be stored or processed in any jurisdiction in which we or our affiliates, suppliers, subsidiaries or agents maintain facilities. By supplying us with Personal Information you consent to any transfer of this information to other jurisdictions (including countries which have not been assessed for adequacy of privacy laws).

Lightbulb Analytics is and shall continue to use industry-standard technology to maintain the security of your personal information, and for our connections to the internet; however, Lightbulb Analytics cannot and does not guarantee the privacy, security, authenticity or non-corruption of any information transmitted through the internet or any for information stored in any third-party system connected to the internet.

While Lightbulb Analytics takes steps to verify that any service providers, suppliers or the like with whom we share information are committed to maintaining the privacy of Personal Information at standards that are at least as stringent as our Privacy Policy and has communicated to them to refrain from making any independent or unauthorised use of any Personal Information, A Lightbulb Analytics does not and cannot guarantee the actions, conduct or standards of any such parties.

Lightbulb Analytics shall not be responsible for any claims, damages, costs or losses whatsoever arising out of or in any way related to third-party connections to or use of the Internet. Lightbulb Analytics

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cannot and does not ensure the protection of any Personal Information that you provide to a third-party website that may reference, be referenced or link to our website. Personal Information collected by these third parties is not subject to, or governed by, this Privacy Policy.

Lightbulb Analytics shall not be responsible for events beyond our direct control. Lightbulb Analytics will not be liable for any direct, indirect, incidental, consequential or punitive damages relating to the uses or releases of Personal Information.

#### Contact

We are committed to upholding our Privacy Policy. We have policies and procedures in place to educate and assist our employees and contractors in fulfilling their obligations under our Privacy Policy. Our policies and procedures will be reviewed on a regular basis and the results of such review will be presented to Lightbulb Analytics' personnel responsible for overseeing privacy matters.

Lightbulb Analytics is committed to treating you with the greatest respect and consideration. Please let us know if you have any questions or concerns and we will take steps to address them. If you have any questions regarding this Privacy Policy, would like to confirm the accuracy of your personal information, believe that the privacy of your personal information has not been respected, or would like to update or delete incorrect personal information, please contact Lightbulb Analytics by emailing us at: info@lba.ltd or write to us the attention of Privacy Policy Manager, Lightbulb Analytics Ltd. Plexal, Here East, East Bay Lane, London E20 3BS. The Privacy Policy Manager will acknowledge your query and will respond within thirty business days. If we need to extend the timing for a response or have to refuse your request, we will advise you accordingly, subject to any legal restrictions.

#### Age

Lightbulb Analytics is committed to protecting the safety of children. Lightbulb Analytics will not knowingly request or use Personal Information from children without parental consent. If Lightbulb Analytics receives actual knowledge and does not knowingly or intentionally collect any Personal Information from children, Lightbulb Analytics will take steps to have such information eliminated. This website is not to be used by anyone under the age of eighteen. Persons under the age of eighteen are not authorised to use this website and are directed to immediately discontinue the use of this website.

## **Updates**

Lightbulb Analytics may from time to time update this Privacy Policy, with the updated policy to be posted on the Lightbulb Analytics website. The use of Personal Information provided to Lightbulb Analytics prior to the update will continue to be governed by the policy in effect at the time the information was provided. We recommend that you revisit this Privacy Policy from time to time on a regular basis.

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#### Consent

By using this website, you agree, and do hereby consent, to our collection and use of information and Personal Information for purposes for which the information/Personal Information was collected and in accordance with this Privacy Policy. If you do not consent, you are to immediately discontinue the use of this website and to refrain from further using this website.

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